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May 16, 2025

Via ECF; Courtesy Copy Via Email

Hon. Naomi Reice Buchwald
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., New York, NY 10007-1312

Re: Chung v. Trump et al., No. 25-cv-2412 (NRB)

Dear Judge Buchwald:

Together with co-counsel, this firm represents Plaintiff-Petitioner Yunseo Chung in the above-captioned matter. We write in furtherance of our April 10, 2025 request to conduct expedited discovery, which Defendants-Respondents opposed on April 14, 2025, and which is ripe for the Court's decision. *See* ECF Nos. 30, 36.

Since the request's filing, the government has produced two of the documents at issue, specifically the Secretary of State Marco Rubio's March 2025 letter to the Department of Homeland Security identifying Ms. Chung as one of two lawful permanent residents to be deported, as well as an administrative arrest warrant for Ms. Chung. *See* ECF No. 34 at 7-8, 10. The undersigned have conferred by email with Defendants-Respondents to ask whether their position on producing the balance of the documents requested remains the same, and Defendants-Respondents confirmed yesterday that they continue to object.

In light of these developments, Ms. Chung respectfully renews her request for the limited discovery set forth in her letter-motion dated April 10, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

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Maazel LLP*

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cc: All Counsel of Record (via ECF)